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GREGORY NOVOA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GREGORY NOVOA,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, SAN FRANCISCO
MUNICIPAL TRANSIT AGENCY, DEBRA
FRANKS, MIKE HELMS, and DOES 1-40,

Defendants.

Case No. C 14-03617-JST

**JOINT STIPULATION REGARDING
DISCOVERY DEADLINES UNDER CIVIL
LOCAL RULE 6-2(A); ~~PROPOSED~~ ORDER**

Judge: Honorable Jon S. Tigar
Court: 450 Golden Gate, Courtroom 9 (Floor 19)

File Date: June 13, 2013
Trial Date: January 11, 2016

Pursuant to Civil Local Rule 6-2(a), Plaintiff Gregory Novoa and Defendants City and County of San Francisco and Deborah Franks hereby submit the following stipulation and proposed order regarding Defendants' motion to compel deadline.

1. On November 17, 2014, the Court issued the following deadlines as part of its case management schedule:

Fact Discovery Cut-Off: May 18, 2015

Deadline to File Dispositive Motions: July 2, 2015

Trial Date: January 11, 2016

(Dkt. No. 19.) Through this stipulation, the parties are jointly requesting an extension permitting Defendants to file a motion to compel regarding their document requests after the dispositive motion hearing in this matter, if such a motion to compel is needed. This is the parties' first request to modify any deadlines in this case.

2. Defendants served document requests on Plaintiff on April 17. Plaintiff was required to respond by May 18, but no responses were provided. Defendants are willing to move for summary judgment without raising this discovery dispute to the Court at this time, but only if Defendants are permitted to file a motion to compel — if needed — after the Court rules on their motion for summary judgment. The parties therefore jointly request that Defendants' motion to compel deadline under Civil Local Rule 37-3, with respect to only the document requests served on April 17, be extended until 30 days after the Court rules on Defendants' summary judgment motion. Such an extension will not affect any other deadlines in this case or the trial date, which is not until January 11, 2016.

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1 Dated: May 20, 2015

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5 By: /s/ Boris Reznikov
BORIS REZNIKOV
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CITY AND COUNTY OF SAN FRANCISCO

8 Dated: May 20, 2015

RUSSELL A. ROBINSON
Law Office of Russell A. Robinson

11 By: /s/ Russell A. Robinson
RUSSELL A. ROBINSON
Attorney for Plaintiff
GREGORY NOVOA

~~PROPOSED~~ ORDER

Pursuant to Plaintiff Gregory Novoa's and Defendants City and County of San Francisco and Deborah Franks' stipulation, it is hereby ordered as follows:

Defendants' motion to compel deadline for the document requests they propounded on Plaintiff on April 17, 2015 is extended until 30 days after the Court rules on Defendants' summary judgment motion.

Dated: May 26, 2015

